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Attorney for Plaintiff,
ROBERT MILLER

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
LAS VEGAS DIVISION**

ROBERT MILLER,

Plaintiff,

v.

4INTERNET, LLC; and DOES 1 through 10
inclusive,

Defendants.

AND

4INTERNET, LLC,

Counterclaimant,

v.

ROBERT MILLER; MATHEW HIGBEE; THE
LAW FIRM OF HIGBEE & ASSOCIATES, APC;
and CHRISTOPHER SADOWSKI;

Counterclaim Defendants.

Case No. 2:18-cv-02097-JAD-
VCF

**DECLARATION OF
EUGENE SADOWSKI**

DECLARATION OF EUGENE SADOWSKI

I, Eugene Sadowski, declare as follows:

1. I am an agent for Plaintiff Robert Miller and Counterclaim Defendant Christopher Sadowski, as well as other photographers similarly situated. I do not have any formal or informal working relationship any news agency and provide the described services in an independent capacity. I assist photographers with keeping track of their intellectual property by discovering unauthorized uses of their photographs.

2. I make this Declaration in support of Counterclaim Defendants' Motion to Dismiss. I have personal knowledge of the following facts, and if called as a witness, I could and would testify as follows:

3. On or about August 31, 2018 I discovered the alleged infringing use of the Image, 8.9.18_Fred_the goat_Miller.jpg registered to Robert Miller under registration number VA 2-120-723 on two Internet, LLC websites, www.4jewish.com and www.4rightwing.com.

4. These alleged infringing uses were found through a manual image search using Google reverse image search. No reverse image search services such as CopyPants or any others were used to discover these uses.

5. When I discover uses through a manual image search, I search for any given photographer's published images by uploading them to Google images, which uses a mathematical algorithm to search for matching websites.

6. Upon finding matches for websites and published images, I list them in a spreadsheet and give them an internal case number. Attached hereto as Exhibit A is an example of this spreadsheet.

7. I then take screenshots of the image, the full page where it is found, a high definition image, and the text of the document showing the URL.

8. I also conduct a GoDaddy WHOIS search and Secretary of State business entity search to find the website owner's contact information.

1 9. For this case, I found the information for 4Internet, LLC through a GoDaddy
2 WHOIS search. *See* Exhibit B.

3
4 I declare under penalty of perjury that the foregoing is true and correct under
5 the laws of the United States of America. Executed on May 7, 2019 at Wayne, New
6 Jersey.

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8 /s/ Eugene Sadowski
9 Eugene Sadowski
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Exhibit “A”

RM-Photos Published Online - G x +
 https://docs.google.com/spreadsheets/d/1skJ8oVBXU3Wba3POFXv4fqXiIRK_SGfyfvmPpKypeY/edit#gid=0

RM-Photos Published Online ☆
 File Edit View Insert Format Data Tools Add-ons Help All changes saved in Drive

100% 123 Arial 12 B I A

Rogue Goat May Have Helped Farm Animals To Escape

	A	B
1	Publishing Date	Story
561	07/09/2018	emt-suing-doctor-for-walking-back-insurance-fraud-claims-that-got-her-fired
562	07/10/2018	judge-tosses-acs-contract-given-to-unqualified-firm
563	07/11/2018	donovan-demands-probe-into-de-biasios-use-of-nypd-spy-plane
564	07/12/2018	construction-worker-dies-after-being-struck-by-falling-pipe
565	07/14/2018	Charter-school-ceos-get-massive-paychecks-thanks-to-private-donors
566	07/17/2018	Stabbing Victims Family Curses Out Killer in Court
567	07/17/2018	NYPD To Assign More Investigators To Sex Assault Cases
568	07/18/2018	NYPD Commissioner Used Anti Terror Plane
569	07/27/2018	Relaxation Gardens Turns Into An Eyesore
570	07/27/2018	Diner Owner Furious He Settled Fraudulent Lawsuit
571	08/02/2018	Prosecutors Laid Out Charges to Norman Seabrook
572	08/04/2018	More Zombie Raccoons Die In Central Park
573	08/09/2018	Rogue Goat May Have Helped Farm Animals To Escape
574	08/10/2018	Mom Who Survived Crash Arrives At Wake In Stretcher
575	08/14/2018	Dinosaur Gets Bath At Museum of Natural History
576	08/14/2018	PA Tests New Security Device that Scans Passerbys
577	08/15/2018	Woman Leaps to Her Death From Midtown Hotel
578	08/16/2018	Former Crew Members Celebrate USS Intrepid 75th Anniversary

Web Address
<https://nypost.com/2018/07/09/emt-suing-doctor-for-walking-back-insurance-fraud-claims-that-got-her-fired>
<https://nypost.com/2018/07/10/judge-tosses-acs-contract-given-to-unqualified-firm>
<https://nypost.com/2018/07/11/donovan-demands-probe-into-de-biasios-use-of-nypd-spy-plane>
<https://nypost.com/2018/07/12/construction-worker-dies-after-being-struck-by-falling-pipe>
<https://nypost.com/2018/07/14/charter-school-ceos-get-massive-paychecks-thanks-to-private-donors>
<https://nypost.com/2018/07/17/stabbing-victims-family-curses-out-killer-in-court>
<https://nypost.com/2018/07/17/nypd-to-assign-more-investigators-to-sex-assault-cases>
<https://nypost.com/2018/07/18/nypd-commissioner-used-anti-terror-plane>
<https://nypost.com/2018/07/27/relaxation-garden-turns-into-eyesore>
<https://nypost.com/2018/07/27/diner-owner-furious-he-settled-fraudulent-lawsuit>
<https://nypost.com/2018/08/02/norman-seabrook-muttered-bulls-fur>
<https://nypost.com/2018/08/04/more-zombie-raccoons-die-in-central-park>
<https://nypost.com/2018/08/09/rogue-goat-may-have-helped-dozen-farm-animals-to-escape>
<https://nypost.com/2018/08/10/mom-who-survived-crash-arrives-at-wake-in-stretcher>
<https://nypost.com/2018/08/14/dinosaur-gets-bath-at-museum-of-natural-history>
<https://nypost.com/2018/08/14/port-authority-tests-new-security-device-that-scans-passersbys>
<https://nypost.com/2018/08/15/woman-leaps-to-her-death-from-midtown-hotel>
<https://nypost.com/2018/08/16/former-crew-members-celebrate-uss-intrepid-75th-anniversary>

Sheet1 Explore
 9:33 PM Wednesday 3/13/2019

Exhibit “B”

<https://www.4jewish.com/nypost.com/rogue-goat-may-have-helped-dozens-of-farm-animals-escape-new-york-post/>

Domain Name: 4JEWISH.COM
Registry Domain ID: 1778802746_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.godaddy.com
Registrar URL: <http://www.godaddy.com>
Updated Date: 2018-02-07T13:32:13Z
Creation Date: 2013-02-06T19:54:44Z
Registrar Registration Expiration Date: 2019-02-06T19:54:44Z
Registrar: GoDaddy.com, LLC
Registrar IANA ID: 146
Registrar Abuse Contact Email: abuse@godaddy.com
Registrar Abuse Contact Phone: +1.4806242505
Domain Status: clientTransferProhibited <http://www.icann.org/epp#clientTransferProhibited>
Domain Status: clientUpdateProhibited <http://www.icann.org/epp#clientUpdateProhibited>
Domain Status: clientRenewProhibited <http://www.icann.org/epp#clientRenewProhibited>
Domain Status: clientDeleteProhibited <http://www.icann.org/epp#clientDeleteProhibited>
Registry Registrant ID: Not Available From Registry
Registrant Name: Michael Levy
Registrant Organization: 4Internet, LLC
Registrant Street: 8275 South Eastern Avenue
Registrant Street: Suite 200-265
Registrant City: Las Vegas
Registrant State/Province: Nevada
Registrant Postal Code: 89123
Registrant Country: US
Registrant Phone: +1.8005684638
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:
Registrant Email: 4internet.com@gmail.com